

REMARKS

This Amendment is responsive to the Final Office Action dated November 28, 2008. All rejections and objections of the Examiner are respectfully traversed. Reconsideration and further examination are respectfully requested.

Applicants wish to thank Examiner Shih for his helpfulness in a telephone interview on January 21, 2009. The Examiner requested that the claim amendments discussed in the interview be submitted officially in a response so that they could be further considered.

The amendments herein are intended to clarify and more precisely claim the present invention. The amendments to the claims herein are supported at various places in the Specification as originally filed. For example, in Fig. 3 the *first attribute* (“onkeydown=”javascript:simpleKey(‘Bold’)”) is shown invoking the *keyboard event handler* (“simpleKey”) and passing the *parameter* (“Bold”) *indicating the predetermined function*, and Fig. 4 shows the *keyboard event handler* (“simpleKey”) passing the *parameter* (“Bold” stored in “param”) from the *first attribute* of the image to the *software routine* (“simple”) that is *operable to perform the predetermined function*. Similarly, Fig. 3 shows the *second attribute* (“onclick=”javascript:simple(‘Bold’)” is shown passing the *parameter* (“Bold”) indicating the predetermined function to the *software routine* (“simple”).

No new matter has been added.

Claim 3 stands rejected for lack of antecedent basis under 35 U.S.C. 112, second paragraph. Amendments to claim 3 are respectfully believed to meet all requirements in this regard.

Claims 1 and 3-4 stand rejected for obviousness under 35 U.S.C. 103 based on the combination of “Using JavaScript to Create a Powerful GUI” of Hourihan (Hourihan), W3C

4.01 Specification ("W3C"), and "Creating a Modal Dialog Box" of Shiran ("Shiran").

Applicants respectfully traverse this rejection.

The button of the Hourihan article is mouse-operable only, and Hourihan includes no hint or suggestion of even the desirability of providing keypress operability of the button in the Hourihan HTML example. On page 4, Hourihan teaches different types of parameters passed for mouse over ("this" in onmouseover(this)) and mouse click ('b' in format_sel('b')) functions. On page 3, in Section 13.2 describing the IMG element, W3C shows intrinsic event functions ("onclick, ondblclick, onmousedown, onmouseup, onmouseover, . . .") that take no parameters.

Shiran discloses that Internet Explorer allows the creation of modal dialog boxes.

Nowhere in the combination of Hourihan, W3C and Shiran is there disclosed or suggested an image command including:

a first attribute determining the processing of at least one predetermined keyboard event, wherein said first attribute is an event handler attribute that invokes a keyboard event handler and *passes to said keyboard event handler a parameter indicating a predetermined function associated with said accessible graphical image*, wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that a predetermined key was pressed, and, in the event that said event object value matches said predetermined value, invoking a software routine operable to perform said predetermined function associated with said accessible graphical image, *wherein said keyboard event handler passes said parameter indicating said predetermined function associated with said accessible graphical image to said software routine operable to perform said predetermined function associated with said accessible graphical image*, and preventing further processing of the keyboard event, and

a second attribute determining the processing of mouse click events, *wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, wherein said second attribute passes said parameter indicating said predetermined function associated with said accessible graphical image to said software routine operable to perform said predetermined function associated with said accessible graphical image, such that said software routine operable to perform said predetermined function associated with said accessible graphical image performs said predetermined function associated with said accessible graphical image responsive to said parameter indicating said predetermined function associated with*

said accessible graphical image both in response to a user pressing said predetermined key and in response to said user performing a mouse click. (emphasis added)

as in the present independent claim 1. In contrast, the commands under “Putting it All Together With HTML” shown on pages 4 and 5 of Hourihan include attributes for mouse events (“onclick”, “onmouseover”, etc.) that use different types of parameters (“b”, “this”), while W3C describes an element that may have intrinsic event attributes (“onclick”, “ondblclick”, etc.) that may cause script to execute whenever the event occurs (see section 18.2.3). Shiran discloses a button for creating a modal dialog box. Nothing in the combination of Hourihan, W3C and Shiran discloses or suggests an image command including a first attribute determining the processing of at least one predetermined keyboard event, wherein said first attribute is an event handler attribute that invokes a keyboard event handler and *passes to said keyboard event handler a parameter indicating a predetermined function associated with said accessible graphical image*, wherein said keyboard event handler . . . [invokes] a software routine operable to perform said predetermined function associated with said accessible graphical image, *wherein said keyboard event handler passes said parameter indicating said predetermined function associated with said accessible graphical image to said software routine operable to perform said predetermined function associated with said accessible graphical image*, . . . and a second attribute determining the processing of mouse click events, *wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image*, *wherein said second attribute passes said parameter indicating said predetermined function associated with said accessible graphical image to said software routine operable to perform said predetermined function associated with said accessible graphical image*, such

that said software routine operable to perform said predetermined function associated with said accessible graphical image performs said predetermined function associated with said accessible graphical image responsive to said parameter indicating said predetermined function associated with said accessible graphical image both in response to a user pressing said predetermined key and in response to said user performing a mouse click, as in the present independent claim 1.

For the above reasons, Applicants respectfully urge that the combination of Hourihan, W3C and Shiran does not disclose or suggest all the features of the present independent claim 1. The combination of Hourihan, W3C and Shiran therefore does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the present independent claim 1. As to the dependent claims, they each depend from independent claim 1, and are respectfully believed to be patentable over the combination of Hourihan, W3C and Shiran for at least the same reasons.

Reconsideration of all pending claims is respectfully requested.

Applicants have cancelled and amended claims, but are not conceding in this application that the unamended or cancelled claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of allowable subject matter. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Applicants' Attorney at the number listed below so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

January 23, 2009
Date

/David Dagg/
David Dagg, Reg. No. 37,809
Attorney/Agent for Applicant(s)
44 Chapin Road
Newton, MA 02459
(617) 630-1131

Docket No. 260-001